

**Table 1: Proposed Minor Revisions to the Existing Timber Waiver.**

Revision Number:	Existing:	Proposed change:	Explanation:
1	Some grammatical error	Correct grammar	Grammar corrections will be made without modification to meaning or intent of any statement within the Timber Waiver.
2	Some spelling error and outdated agency reference	Correct misspellings and update agency reference to reflect current titles	i.e., correct “Bare” to “BAER” for Burned Area Emergency Response; and replace all “CDF” references with “Cal Fire.”
3	Complicated and confusing document structure that is difficult to follow and understand	Revise document structure	The goal of revising the document will be to achieve a more logical flow of information.
4	Complicated language	Modify language	Make the document more clear
5	Overuse of references to other sections of document	Remove and minimize unnecessary internal document references	This will aid reader comprehension
6	Redundancies	Remove and minimize redundancies	Redundancies within the existing Timber Waiver make the document difficult to read and understand.
7	Eight-page resolution section with citations to regulatory authority and mandate	Remove resolution section and incorporate necessary legal citation into Timber Waiver	Essential statements and references made within the resolution section of the existing Timber Waiver can be incorporated into the language of the Timber Waiver.

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8		Add an application checklist to assist the applicant in designing an eligible timber harvest or vegetation management project, and to ensure a complete Timber Waiver application is submitted to the Water Board.	This will save time and effort of both the applicant and regulatory staff.
9	Unclear monitoring & reporting requirements for dischargers enrolled under the Timber Waiver, but have not started timber harvest & vegetation management activities.	Stipulate within the waiver that semi-annual reports are required once the project is covered under the Timber Waiver regardless of whether activities have commenced. The monitoring and reporting requirement will persist until Water Board staff have approved termination of the applicability of the Timber Waiver.	This will facilitate discharger monitoring & reporting compliance with the Timber Waiver.
10		Add the following statement to the Timber Waiver: "Approval from Water Board staff to proceed with timber harvest and vegetation management activities under this waiver does not preclude the requirement to obtain other required permits from other agencies and jurisdictions. Examples of other permitting and regulatory agencies include, but are not limited to, local jurisdictions (i.e., city and county, federal, state (i.e. Cal Fire), and the Tahoe Regional Planning Agency).	This has been implied under the previous Timber Waiver, but stating this requirement will help to facilitate landowner compliance with all applicable laws & regulations.

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11		<p>Add the following statement to the Timber Waiver: "To ensure compliance with the Timber Waiver, please verify that all best management practices and mitigation measures described within documents submitted to the Water Board are included in applicable sale and service contracts with timber operators and crews."</p>	<p>This will not be a requirement of the Timber Waiver. Instead it is a suggestion to the applicant. If violations or deviations from the project description are observed by Water Board staff, all associated enforcement actions would be directed to the landowner or applicant, not their hired staff or contractors. It is the responsibility of the project proponent/landowner to take all necessary actions to ensure compliance with all Water Board permits, requirements, or waivers; and to stay within the description of the project submitted to the Water Board.</p>
13	<p>"Vegetation Management Activities" is not defined, and the title of the existing Timber Waiver only mentions "Timber Harvest Activities." However vegetation management activities that do not necessarily include timber harvest are governed by this Timber Waiver.</p>	<p>Include "Vegetation Management Activities" within the title of the Timber Waiver, and add a definition for "Vegetation Management Activities" within the text of the Timber Waiver. "Vegetation Management Activities within the context of the Timber Waiver will mean all activities related to the management of vegetation, including all activities listed within the definition of "Timber Harvest Activities."</p>	<p>These minor revisions will simply clarify the intent of the Timber Waiver.</p>

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14	Timber operations to be conducted in compliance with the requirements of 14 CCR 1038(a) or (b), are eligible for coverage under the existing Timber Waiver under Category 2, therefore monitoring and reporting is required, unless individually waived by the Executive Officer.	Specifically state within the Timber Waiver that timber harvest activities conducted in compliance with the requirements of 14 CCR 1038(a) or (b), which have received an Exemption from the California Department of Forestry and Fire Protection (Cal Fire), are not required to conduct monitoring and reporting, unless the Executive Officer imposes an individual Monitoring and Reporting Program to a particular landowner.	Water Board staff have determined that timber operations conducted in compliance with the requirements of 14 CCR 1038(a) or (b) do not pose a significant threat to water quality.